



PROGRESS REPORT NO. 126

TO: Laura Buelow, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig – Teck American Incorporated (TAI)

DATE: January 10, 2017

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 126 Month Ending December 2016

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Phase 2 Sediment Study - TAI in receipt of EPA's the December 9, 2016 letter transmitting EPA's comments on the December 2015 draft Phase 2 Sediment Study Data Summary and Data Gap Report (DSR). TAI is currently evaluating and revising the document in response to the comments however, on December 20, 2017 TAI submitted a letter to EPA requesting an extension of the deadline to deliver the revised report and response to comments from January 10, 2017 to April 10, 2017 (90 days from the original deadline). At the time of writing, EPA approved the extension in a letter dated January 9, 2017.

Benthic Macroinvertebrate Tissue Study – Following completion of the summer/fall field sampling TAI revised the sample compositing plan and submitted a draft final version to EPA on October 27, 2016. EPA provided a revised approach to the compositing plan in an email to TAI on December 7, 2016 and met with TAI on December 12, 2017 to discuss the approach. During December 12 call, TAI requested EPA provide a memo detailing how the revised approach was developed and EPA provided the memo to TAI on December 21, 2016. TAI is evaluating the memo and will provide response to EPA in early January 2017.

Recreation Consumption and Resource Use Survey – EPA provided the Draft Final Data Analysis Report (DAR) for the Recreational Use Survey to TAI on April 15, 2016 and TAI submitted review comments to EPA on June 10, 2016. TAI has postponed its review of the November 23, 2015 Memorandum written by SRC titled "Recreation Use Survey

Fish Ingestion Rate” given that the memorandum referenced the following version of the DAR for the recreational use survey: “SRC, Inc. (2014). Data analysis report for the recreational use survey for the Upper Columbia River Site human health risk assessment and remedial investigation/feasibility study. Prepared under contract for the Environmental Protection Agency. January 16.”

Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled “Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation” as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016.

2016 Residential Soil Sampling – On December 4, 2016 TAI submitted a memorandum to EPA summarizing the list of soil samples collected during the 2016 Residential Soil Study that would be submitted for in vitro bioaccessibility assay analysis (IVBA analysis); preliminary (unvalidated) analytical laboratory data for lead and arsenic concentrations in incremental composite soil samples were used to generate the list. EPA approved the IVBA selection in an email to TAI on December 14, 2016 and TAI directed its contract laboratory to proceed with the IVBA analysis on the samples from the memo. On December 28, 2016 TAI provided validated analytical data with location information (minus data for IVBA analysis on samples from the memo) in electronic format with a transmittal letter. In the transmittal letter, TAI noted that the default deadline for TAI to submit the draft DSR for the 2016 Residential Soil Study to EPA is March 1, 2017 but that validated data for the samples approved by EPA on December 14 for IVBA analysis will not be available until mid-January. Therefore, TAI requested a 30-day extension (to March 31, 2017) to accommodate for the added time to select and obtain EPA approval of samples for IVBA analysis and incorporate the full study data set into the draft DSR. At the time of writing, EPA approved the extension in a letter dated January 10, 2017.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon DSR and response to EPA’s comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI’s response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015.

Soil Amendment Technologies Evaluation Study – TAI is in receipt of a letter from EPA dated December 6, 2016 with additional information to guide Teck as it conducts the study and an offer to set up a webinar to have EPA’s technical experts present the information and answer questions. TAI responded and worked with EPA to set up the webinar for January 11, 2017.

Analytical Support for Sturgeon Sampling Effort – The nine sturgeon fillet composite samples have been processed and analyzed, data were validated and submitted to EPA for review by December 19, 2016. On November 17, 2016 EPA delivered the draft field

summary report (FSR) for review and TAI submitted comments to EPA on December 13, 2016. At the time of writing, EPA submitted the draft final FSR to TAI in an email dated January 10, 2017.

Assessment and Estimations of Upland Soils on the UCR Site (background soil study) – TAI is in receipt of EPA's letter of December 2, 2016 requiring a response to EPA's July 22, 2016 formal transmittal of a Level of Effort for Assessment and Estimations of Upland Soils on the UCR site by January 9, 2017.

Plant Tissue Study – TAI is in receipt of a letter from EPA dated December 8, 2016 regarding approach for conducting plant tissue sampling and proposed that EPA develop the quality assurance project plan and lead the sampling program with Teck's funding. EPA required a response by January 13, 2017.

Delineation of Upland Aerial Footprint Reflecting Atmospheric Deposition of Trail Facility Emissions – TAI requested and EPA agreed that a meeting to discuss a delineation/footprint study will occur before the above reference background soil and plant tissue studies proceed. TAI is working with EPA to set a date for the meeting at the end of January.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.